

In THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION
2006 AUG -3 AM 9:45

Richard Wayne Wright, sr., * Plaintiff, Pro-Se., * CIVIL Action No
- VS - * 2005-CV-439-A-WO
Sylvester Nettles, et.al., * Defendants. *

Plaintiff Wright Motion Seeking Permission
Was Granted To File A Temporary
Restraining Order And Protection Order
'Court Doc No. 189' Order On Motion

I am Richard Wayne Wright, sr. Beu Plaintiff, Pro-Se., A.I.S # 187140 do Comes Now in the above encaption 'motion' mention " Plaintiff Wright Motion For A Temporary Restraining Order And Protection Order" which "IF granted" and exrcuted upon defendants and defendant's agents Should be an aid in preserving plaintiff life, removing some of the present danger and help plaintiff be Relieving (his) present Intense situation which plaintiff Wright is eagerly trus to avoid another assault by D.O.C. Officials here at Ventress

Correctional Facility (V.C.F.) or/ and encounter another induction of psychotropic medication into Plaintiff body involuntarily as done by defendant's in the past. Plaintiff after being assaulted by D.O.C. officials here at Ventress (V.C.F.) had three (3) disciplinary's placed upon him^s as to conceal/ cover the acts of retaliation executed by them involved on November 23, 2005.

Plaintiff has had to continually contend^{R.W.W.} with the medical staff at the Bullock County Hospital and the hired medical staff through Prison Health Services at Ventress (V.C.F.) and Bullock Correctional Facility (B.C.F.). The Prison Health Service (P.H.S.) employee's at Ventress (V.C.F.) and Bullock (B.C.F.) deliberate indifferent has shown^{R.W.W.} been shown by proving repeatedly examples of negligent acts which disclose a pattern of conduct by prison medical staff (P.H.S.,...) by proving their^s acts are such systemic and gross deficiencies in staffing procedures to effectively supply adequate medical

treatment / Care. This too adds to Plaintiff's Fears as well because Plaintiff knows not when they shall be injured again, go to the Bullock County Hospital where defendants Dr. T. Siddiq (M.D.) awaits, where in they can conduct procedure(s) inevitably to cause Plaintiff Wright unnecessary suffering and/or death.

Defendant's has falsely applied the latest disciplinary to place Plaintiff in Segregation to control Plaintiff litigation process. Plaintiff has reported, complained and sent written documentation even Certified mailed to Warden J.C. Gales and designee's at Ventress (V.C.F.) and Mr. Richard Allen (Prison Commissioner) which they have not taken one step of procedural safety in response to the complaints, reports and documentation informed upon them concerning Plaintiff Wright. (See Exhibit One (I)) - Certified mail 'Copy's' receipt, letters were sent to this Honorable Court labeled as Statement / Formal letter/ Affidavit with the last Exhibits plaintiff Wright mailed

On or about Monday July 31,
2006.) (See Also Exhibit Two (Q)).

Done this the 1st day of
August 2006.

Respectfully Submitted,
Richard W. Wright, Sr. Bey

Richard Wayne Wright, Sr. Bey #187140
Ventress Correctional Facility
Segregation Unit/Cell #801
Post OFFice Box 767
Clayton, Alabama 36016

Certificate of Service

This is to Certify that I Richard Wayne Wright, Sr. Bey, Plaintiff, Pro-Se, am the petitioner in the above en-Captioned motion and Certify I have Sent a Copy of this 'motion' to the Clerk of this Court and earnestly ask due to plaintiff's Indigent Status that this Honorable Court and/or Clerk Forward a Clock Stamp Front Page Copy to Plaintiff and a Copy OF this Said motion to defendant's Counsel(s) Which addresses are as Following:

Gregory F. Yauhmai & ~~W~~
~~ASB-24111-H67G~~
William A. Scott, Jr.
(ASB-1539-073W)
Scott, Sullivan, Streetman & Fox, P.C.
24150 Valley Dale Road
Birmingham, Alabama 35244

Troy King (Attorney General)
State Bar # ASB - 5949-561S
Steven Mallette Sirmon
(Assistant Attorney General)
Hugh Davis (Attorney)
Alabama Board Pardon and Paroles
Post Office Box 302405
Montgomery, Alabama 36130

David B. Block (ASB - 5098-K62D)
William R Lunsford (ASB-4265-L72L)
Douglas B. Hargett (ASB-9928-S81H)
Balch & Bingham LLP
Post Office Box 18668
Huntsville, Alabama 35904-8668

Kim T. Thomas
Gregory Marion Biggs
Alabama Department of Corrections
Legal Division
301 Ripley Street
Montgomery, Alabama 36130

by placing this Motion in the hands
of the on duty officer to place
this in the legal mail box for
postage to be paid by the prison
officials here to place in the
United States mail box at Ventress
Correctional Facility after postage
is supplied and properly address
this on the 1st day of August 2006.

Respectfull Submitted,
Richard Wayne Wright, Sr. Bey
Richard Wayne Wright, Sr. Bey #187140
Ventress Correctional Facility
Segregation Unit / Cell #801
Post Office Box 767
Clanton, Alabama 36016